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**COMMONWEALTH OF PENNSYLVANIA**  
**HARRISBURG**

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July 5, 2000

Mr. Joe McDowell  
Remedial Project Manager  
U. S. Environmental Protection Agency  
Region III, Hazardous Site Cleanup Division  
1650 Arch Street - 3HS21  
Philadelphia, PA 19103

Re: The June 2000 Superfund Program proposed plan for the Crater Resources Inc./Keystone Coke/Alan Wood Steel Co. site in Upper Merion Township, King of Prussia, Pennsylvania.

Dear Mr. McDowell:

In reviewing this plan, I noticed it states "the primary objective is to reduce or eliminate the potential for human or ecological exposure to contaminated soil, sediment, and groundwater at the site" (p. 2). I have several questions and concerns:

1. Why, if the site has been listed on the NPL since October 1992, is the EPA only now concerned about the extent of trespassing on the property? (\*meeting commentary 6/27/00)
2. Who should have been responsible for institutional controls and for posting the property during this time period?
3. Why has it taken so long from the first groundwater monitoring survey in 1979, to its listing in 1992 on the NPL, until its 1994 Remedial Investigations/Feasibility Study and its completion in January 1999? And only now, 22 years after the site was closed by Alan Wood Steel, is remediation being discussed?
4. I have read your "Summary of Site Risks" - can you please explain what "the greatest maximum hazard index risk is to a child resident potentially using groundwater" means, or "a resident ingesting contaminated soils from Quarry 3?" Is a risk-based clean up intended? Would mosquitoes or flies transmit contaminants?
5. My constituents in Hughes Park are very concerned about the storm water runoff from the site that they experience with each severe rain. Since this is not addressed in your report, please advise as to the storm water and erosion/sedimentation controls that will be instituted, their placement at the site, and the intended duration of their placement there?

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6. What monitoring will the EPA and the potentially responsible parties conduct on site during the construction period, should this project be approved?
7. What monitoring will the EPA and the potentially responsible parties conduct should the project be completed? Mr. O'Neill states he has a perfect record of compliance with EPA regulations and standards in his other projects. Is this record available for public inspection?
8. Can Upper Merion Township withdraw approval of construction if remediation does not proceed as expected?

Thank you for your assistance with these questions. I look forward to hearing from you soon.

Sincerely,

*Connie Williams*

Connie Williams  
State Representative  
149th Legislative District

CW:dh

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